REMARKS

Applicants thank the Examiner for consideration given the present application. Claims 1-7, 9-18, 20-22, 24, 25 and 27 are presently pending. Claims 8, 19, 23 and 26 have been canceled. Claims 1, 11, 22, 24, 25 and 27 are independent. Claims 1, 3-5, 7, 9, 11, 12, 14-16, 18, 20, 22, 24, 25 and 27 have been amended. Applicants respectfully request reconsideration of the rejected claims in light of the amendment and remarks presented herein, and earnestly seek timely allowance of all pending claims.

Claim Rejections Under 35 USC §103 – Liao, Di Federico

Claims 1-7, 10-18, 21, 22, 24, 25 and 27 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Liao et. al. ("Liao", U.S. 2004/0075660 A1) in view of Di Federico et. al. ("Di Federico", U.S. 2005/0226538 A1). This rejection is respectfully traversed.

Amended independent claim 1 recites, *inter alia*, "**a control section for setting a first color element level for a subpixel overlapping a basic portion of the character, based on both or either a first distance between a center of the subpixel and at least one dot contained in a stroke in a first direction or a line width set for the stroke, and setting a second color element level for a subpixel near the subpixel having the set first color element level, based on a second distance between the subpixel having the set first color element level and the near subpixel in a second direction perpendicular to the first direction and the set first color element level**." Amended independent claims 11, 22, 24, 25 and 27 also express the above-mentioned claim feature. Neither Liao nor Di Federico teaches or suggests a two-step method.

Firstly, Liao's invention is about pre-calculating the blending factor α for different parameters and storing the results in an index table 341 so that it is not necessary to calculate equations (2) and (3) in real time (*See ¶30*).

Furthermore, applying Liao's invention to characters is not obvious, and Applicants challenge the Examiner's implied use of Official Notice. Although as alleged by the Examiner,

not all characters are comprised of a curve, one skilled in the art will certainly consider all possible scenarios in order to determine whether it is feasible to make such modification to <u>Liao</u>. Due to the nature of some characters involving curve lines, the size of <u>Liao's</u> index table will considerably increase, one skilled in the art therefore will not be motivated to apply <u>Liao</u> to character drawings since there simply lacks reasonable expectation of success. MPEP § 2143.02.

Moreover, <u>Liao</u> simply fails to teach or suggest determining the color level in two steps in two dimensions, namely, setting a first color level for the basic portion of the character, based on parameters of the first dimension, and subsequently adjusting/setting a second color element level for near subpixels based on parameters of the second dimension. <u>Liao's</u> invention clearly is a one-step determination.

<u>Di Federico</u> does not cure the deficiencies of <u>Liao</u>. For example, <u>Di Federico</u> teaches generating some gray level pixels around the characters (*See ¶71*), however, <u>Di Federico</u> fails to specify the method recited in the claimed invention.

For at least the reasons stated above, independent claims 1, 11, 22, 24, 25 and 27 are patentably distinct from <u>Liao</u> and <u>Di Federico</u>. Claims 2-7, 10, 12-18 and 21 are at least allowable by virtue of their dependency on corresponding allowable independent claim.

Accordingly, it is respectfully requested to withdraw this obviousness rejection of claims 1-7, 10-18, 21, 22, 24, 25 and 27 based on <u>Liao</u> and <u>Di Federico</u>.

<u>Claim Rejections Under 35 USC §103 – Drewry, Di Federico</u>

Claims 1, 8, 9, 11, 19 and 20 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Drewry et. al. ("Drewry", U.S. 5,748,178) in view of Di Federico et. al. ("Di Federico", U.S. 2005/0226538 A1). This rejection is respectfully traversed.

Amended independent claim1 recites, *inter alia*, "**a control section for setting a first color element level for a subpixel overlapping a basic portion of the character, based on**

both or either a first distance between a center of the subpixel and at least one dot contained in a stroke in a first direction or a line width set for the stroke, and setting a second color element level for a subpixel near the subpixel having the set first color element level, based on a second distance between the subpixel having the set first color element level and the near subpixel in a second direction perpendicular to the first direction and the set first color element level." Amended independent claim11 recites, *inter alia*, "**a control section for setting a first color element level for a subpixel within a predetermined range based on both or either a first distance between a center of the subpixel and at least one dot contained in a stroke in a first direction or a line width set for the stroke, and setting a second color element level for a subpixel near the subpixel having the set first color element level, based on a second distance between the subixel having the set first color element level and the near subpixel in a second direction perpendicular to the first direction and the set first color element level.**" Neither Drewry nor Di Federico teach or suggest these claim features.

Drewry's invention is to provide improved methods for rendering vector graphics which are superimposed on top of rapidly changing background images.

Firstly, it is not obvious for one skilled in the art to recognize how such method is applied to character drawing since the nature of the pixels to be process is largely changed and therefore the Applicants challenge the Examiner's implied use of Official Notice.

Moreover, Drewry mentions applying a convolution filter to all of the pixels which lie on either side of the line, the convolution filter itself being generally a set of weightings applied to neighboring pixels (e.g., filter template 394) (*See Column 1, Line 48-Column 2, Line 8*). As clearly seen from Figure 3 of Drewry, Drewry teaches applying a two dimensional weighting at a time which is associated with its image background nature. Therefore, Drewry clearly fails to teach or suggest the two-step (one dimension at a time) color setting.

The Examiner refers to background part of Drewry to rejected the newly added features of claims 1 and 11. Drewry only teaches blending certain pixels according to the colors and

distance of neighboring pixels. However, <u>Drewry</u> does not teach or suggest two steps performed in two dimensions and <u>Di Federico</u> does not cure this deficiency.

For at least the reasons stated above, independent claims 1 and 11 are patentably distinct from <u>Drewry</u> and <u>Di Federico</u>. Claims 8, 9, 19 and 20 are at least allowable by virtue of their dependency on corresponding allowable independent claim.

Accordingly, it is respectfully requested to withdraw this obviousness rejection of claims 1, 8, 9, 11, 19 and 20 based on <u>Drewry</u> and <u>Di Federico</u>.

<center>Conclusion</center>

In view of the above amendment, applicant believes the pending application is in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Michael R. Cammarata, Reg. No. 39,491 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

Due Date: December 29, 2008   Respectfully submitted,

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